

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In Re:

Zakiyyah Najir Mitchell,

Debtor(s)

Chapter 13

Bankr. No. 24-13937-amc

DEBTOR'S RESPONSE TO MOTION
FOR RELIEF FROM STAY

Zakiyyah Najir Mitchell, debtor, by and through the undersigned counsel, makes the follow response and answer to Movant's motion for relief from automatic stay:

1. Movant, PENNYMAC LOAN SERVICES, LLC, services (or owns) a debt that is secured by a lien on the debtor's principal residence.
2. Debtor and Movant are in the process of negotiating an agreed order or stipulation that will address repayment of any post-petition arrears that may be due and owing.
3. On or about February 13, 2025, counsel for Movant emailed debtor's attorney that she hoped to hear back from the Movant with settlement options soon and asked that the debtor file a response to the pending Motion for Relief from Stay so that it would not be granted in error.
4. The debtor requests that the court grant the parties additional time to complete the negotiating process.

WHEREFORE, Debtor prays that the movant's motion for relief from automatic stay is continued to give the parties additional time to negotiate a mutually agreeable resolution of movant's motion, denied, or for such other relief as the Court deems just and equitable.

Respectfully submitted,

/s/ Michael Davey
Michael Davey (331265)
Full Circle Law
716 E. Willow Grove Avenue
Wyndmoor, PA 19038

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

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| In Re: Zakiyyah Najir Mitchell, Debtor(s). | Bankr. No. 24-13937-amc Chapter 13 |
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CERTIFICATE OF SERVICE

I, Michael Davey, certify, that on or about February 21, 2025, I did cause a true and correct copy of the documents described below to be served on the parties listed on the mailing list exhibit, a copy of which is attached and incorporated as if fully set forth herein, by the means indicated and to all parties registered with the Clerk to receive electronic notice via the CM/ECF system: **DEBTOR'S RESPONSE TO MOTION FOR RELIEF FROM STAY.**

I certify under penalty of perjury that the above document(s) was sent using the mode of service indicated.

Date: 02/21/2025

/s/ Michael Davey
Michael Davey, Esq. (331265)
Full Circle Law
716 E. Willow Grove Avenue
Wyndmoor, PA 19038

Mailing List Exhibit: (Check all that apply. If via e-mail, include e-mail address. Continue to the next page if necessary.)

Office of the US Trustee
Robert N.C. Nix Fed. Courthouse
900 Market Street, Suite 320
Philadelphia, PA 19107
USTPRegion03.PH.ECF@usdoj.gov

US Trustee

Via: ☒CM/ECF ☐1st Class Mail ☐Certified Mail ☐e-mail ☐Other: _____

Mailing List Exhibit: (Check all that apply. If via e-mail, include e-mail address. Continue to the next page if necessary.)

Kenneth E. West
Office of the Chapter 13 Standing Trustee
190 N. Independence Mall West, Suite 701
Philadelphia, PA 19106
ecfemails@ph13trustee.com, philaecf@gmail.com

Bankruptcy Trustee

Via: ☒CM/ECF ☐1st Class Mail ☐Certified Mail ☐e-mail ☐Other: _____

Mailing List Exhibit: (Check all that apply. If via e-mail, include e-mail address. Continue to the next page if necessary.)

PennyMac Loan Services, LLC

c/o Denise Carlon, Esquire

KML Law Group, P.C.

Suite 5000 - BNY Mellon Independence Center

701 Market Street

Philadelphia, PA 19106-1532

bkgroup@kmlawgroup.com

Attorney for Movant

Via: ☒CM/ECF ☐1st Class Mail ☐Certified Mail ☐e-mail ☐Other: _____

Mailing List Exhibit: (Check all that apply. If via e-mail, include e-mail address. Continue to the next page if necessary.)

ANY OTHER ENTITIES ON CM/ECF NOTIFICATION SYSTEM

Via: ☒CM/ECF ☐1st Class Mail ☐Certified Mail ☐e-mail ☐Other: _____